Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Revisions of the Commission's Rules	)	CC Docket No. 94-102
To Ensure Compatibility with	)	DA 99-1049
Enhanced 911 Emergency Calling Systems	)	
	)	

SPRINT PCS REPLY COMMENTS

The Commission should certainly permit industry's pursuit of handset-based, network-based and hybrid automatic location identification ("ALI") solutions. It is the view of Sprint PCS that handset-based and hybrid ALI solutions promise to increase the number of 911 callers that can be located and improve the accuracy of location identification — while reducing substantially the costs of deploying an ALI capability.[1] Judging from the various waiver requests, the comments, the *ex parte* presentations, and the E911 roundtable held at the Commission, it is clear that the current development of ALI technologies is complex and fluid. The Commission, by its rules or action on pending waiver requests, should not favor one technology over another, particularly since a

[1] NENA's opposition to handset solutions promising to provide more precise location at lower cost baffles Sprint PCS. Suffice it to say that NENA's belief that ALI implementation costs have little relevance is not shared by other public safety organizations. *See* APCO Comments. With respect to NENA's assertion that sufficient evidence has not been introduced concerning the attractiveness of handset solutions, Sprint PCS refers NENA to the comments filed by the King County E911 Program, which summarize the results of its test of one GPS-based solution.

carrier's choice of technology will not impact the costs 911 call centers will incur in using ALI data.

Industry is nearing completion of an ALI delivery interface standard that will enable 911 call centers to receive ALI data in the manner they choose.[2] With this standard, each 911 call center will have the flexibility to use its preferred delivery method — *regardless* of the ALI solution used by carriers with a presence in the call center's jurisdiction (whether a carrier uses a handset-only solution, a network-only solution, or some combination of the two).[3] The industry group developing this interface standard (TR-45.2 Ad Hoc on Emergency Services) has committed to completing its work before the end of this year.[4] This, in turn, will enable 911 call center vendors to begin modifying their products to incorporate ALI capabilities, thereby providing 911 call centers with a robust choice in ALI products.[5]

Completely baseless is the assertion of one network solution developer that the handset solutions being developed by "SnapTrack, Qualcomm, SiFR, and IDC

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[2] *See* Telecommunications Industry Association – Wireless Communications Division Comments.

[3] *Id.* at 3 (The standard "will allow all of the known location technologies, both network-based and handset-based, to provide data to a PSAP in the framework of a common interface. This future J-STD is intended to convey whatever is necessary, in terms of data elements, thereby facilitating the Commission's policy of being technologically and competitively neutral with regard to possible approaches to ALI.").

[4] *See id.* at 3.

[5] Remarkably, a consumer group now takes the position that the FCC should *restrict* the choices made available to 911 call centers by requiring carriers to use a specific delivery interface. *See* Wireless Consumers Alliance Comments at 2. Reducing the options available to 911 call centers will simply have the effect of increasing their ALI implementation costs. *Compare* APCO Comments at 3 ("[T]he availability of competing technologies will lead to improved performance and lower costs.").

are all incompatible."[6] At least the CDMA industry has been working diligently to ensure that CDMA networks will be able to interoperate with any GPS-capable handset — *regardless* of the specific GPS methodology adopted by the handset vendor. "Baseline" language for this standardized CDMA network/handset interface has already been developed, and this language is currently undergoing a technical review (known as "verification and validation").[7] It is anticipated that the draft standard will be submitted for industry ballot within weeks, and that a final industry standard will be published before the end of the year.

GPS-capable handsets have been developed and tested. The 911 call center serving King County, Washington (the Seattle metropolitan area) has recently tested one GPS handset solution. Based on the test results, the King County center has determined that this technology is "very effective in meeting the needs of public safety to locate wireless 911 callers," stating that it is "very excited about the capabilities of handset-based GPS technology."[8] Moreover, it is reasonable to expect further advances in technology.[9]

The sooner the Commission acts on the pending waiver requests, the sooner handset vendors can begin redesigning their equipment to include GPS capability

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[6] Radix Technologies Comments at 4.

[7] *See* TIA TR-45.5, *Location Service Standard,* PN-4535, TR45.4.2/99.06.15.01 (June 1999) (forwarding the baseline text to the TR-45.5 plenary group for its approval). *See also* U S WEST Wireless Comments at 2-3 and n.4.

[8] King County E911 Program Comments at 2 and 3.

[9] Indeed, earlier this week Bell Labs announced that it had achieved accuracy within 15 feet when mobile users are outdoors and 100 feet when they are indoors. *See* Lucent Press Release, "Bell Labs Geolocation Technology Pinpoints Wireless 911 Calls Within 15 Feet" (June 30, 1999), available at: www.lucent.com/press/0699/990630.bla.html.

— and the sooner the American public will have the choice to take advantage of this exciting new development.[10]

Respectfully submitted

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[10] Completely unrealistic is the argument that handset vendors be required to manufacture only GPS handsets "within 6 months." Wireless Consumers Alliance Comments at 2. Even if the FCC has jurisdiction over manufacturers of unregulated CPE, given the number of models made by most handset vendors, it is simply not possible for vendors to redesign all of their models in six months, much less change their manufacturing process so that only GPS handsets are produced.

Certificate of Service

I, Tony Traini, hereby certify that on July 2, 1999, I caused to be served by first class mail copies of these reply comments.

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